

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

MAWSON INFRASTRUCTURE GROUP,
INC.

Alleged Debtor.

Chapter 11

Case No. 24-12726 (MFW)

**DECLARATION SETH A. NIEDERMAN IN SUPPORT OF MAWSON
INFRASTRUCTURE GROUP INC.'S MOTION (I) FOR A BOND PURSUANT
TO 11 U.S.C. § 303(e), AND (II) FOR SANCTIONS FOR WILLFUL
VIOLATION OF THE AUTOMATIC STAY**

I, Seth A. Niederman, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am a partner at the officers of Fox Rothschild LLP, counsel to Mawson Infrastructure Group, Inc. (“Mawson” or the “Alleged Debtor” or the “Company”), in the above-captioned involuntary bankruptcy case. I make this declaration in support of Mawson’s *Motion (i) for a Bond Pursuant to 11 U.S.C. § 303(e); and (ii) for Sanctions for Willful Violation of the Automatic Stay* (the “Motion”) filed contemporaneously herein.¹

2. I am over the age of 18, except as otherwise indicated herein I have personal knowledge of the facts set forth herein or have obtained familiarity with such facts from persons knowledgeable of them, and if called upon to testify, could and would do so.

3. A true and correct copy of the MIG1 Receivers’ responses and objections to Mawson’s first set of Discovery Demands is attached hereto as **Exhibit 1**.

¹ Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Motion.

4. A true and correct copy of the affidavits (without exhibits) of Andrew Glenn, dated January 25, 2025 and February 10, 2025, submitted in the Australian Proceeding are attached hereto as **Exhibit 2.**²

5. A true and correct copy of the letters sent by the Liquidator to (i) Michael Hughes, dated February 12, 2025 and (ii) John Gotaskie, dated February 14, 2024 are attached hereto as **Exhibit 3.**

6. A true and correct copy of the April 11, 2025 correspondence from Duncan Clubb of BDO, as Joint and Several Deed Administrator is attached hereto as **Exhibit 4.**

7. A true and correct copy of the April 15, 2025 notice of meeting of creditors sent by David Webb of Webb Advisory, as liquidator for Mawson's Australian subsidiary, Mawson Au Pty Ltd. is attached hereto as **Exhibit 5.**

8. A true and correct copy of the February 24, 2025 Fox Rothschild letter to the Australian Liquidator is attached hereto as **Exhibit 6.**

9. A true and correct copy of the *Current & Historical Company Extract* for W Capital is attached hereto as **Exhibit 7.**

10. A true and correct copy of the *Current & Historical Company Extract* for Defender Asset Management Pty Ltd and Vertua Limited's Annual Report dated March 31, 2024 are attached hereto as **Exhibit 8.**

11. A true and correct copy of my email communications to counsel to the Petitioning Creditors dated April 29, 2025 and May 1, 2025 are attached hereto as **Exhibit 9.**

² The exhibits to the affidavits are voluminous, and accordingly, are not included. The exhibits to the affidavits can be available upon request.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed On: May 4, 2025

/s/ Seth A. Niederman
Seth A. Niederman